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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF WYOMING

CARLIE SHERMAN, ANNA GOZUN,)	
AMANDA NASH, and JOHN DOE, on behalf)	
Of themselves and all similarly situated persons,)	
71.1.100)	
Plaintiffs,)	
)	Civil Action No.: 20-cv-00215
V.)	
TRINITY TEEN SOLUTIONS, INC., a Wyoming)	
corporation; TRIANGLE CROSS RANCH, LLC,)	
a Wyoming limited liability corporation; MONKS)	
OF THE MOST BLESSED VIRGIN MARY OF)	
MOUNT CARMEL, d/b/a MYSTIC MONK)	
COFFEE, a Wyoming Corporation; GERALD E.)	
SCHNEIDER; MICHAELEEN P. SCHNEIDER;)	
ANGELA C. WOODWARD; JERRY D.)	
WOODWARD; DANIEL SCHNEIDER;)	
MATHEW SCHNEIDER; MARK SCHNEIDER;)	
KARA WOODWARD; KYLE WOODWARD;)	
THOMAS GEORGE; JUDITH D. JEFFERIS;)	
DALLY-UP, LLC, a Wyoming limited liability)	
corporation; ROCK CREEK RANCH, INC., a)	
Delaware corporation; DIOCESE OF CHEYENNE)	
a Wyoming corporation; the SOCIETY OF OUR)	
LADY OF THE MOST HOLY TRINITY, a)	
Texas corporation; and NEW MOUNT CARMEL)	
FOUNDATION, INC., a Wyoming corporation,)	
)	
Defendants)	

DEFENDANT NEW MOUNT CARMEL FOUNDATION, INC.'S MOTION TO DISMISS PLAINTIFFS' FIRST AMENDED COMPLAINT

Defendant New Mount Carmel Foundation, Inc. (hereinafter "Foundation"), through their attorneys Schwartz, Bon, Walker & Studer, LLC, and Patterson Buchanan Fobes & Leitch, Inc., P.S., hereby moves under Federal Rule of Civil Procedure 12(b)(6) to dismiss Plaintiffs' claims against the Foundation for failure to state a claim upon which relief may be granted. The Foundation has submitted its supporting Brief contemporaneously with this Motion. For the foregoing reasons and those reasons contained in the supporting Brief, the Foundation respectfully requests that the Court dismiss Plaintiffs' claims against the Foundation, with prejudice.

DATED this 26th day of March, 2021.

SCHWARTZ, BON, WALKER & STUDER, LLC

By: s/Rick L. Koehmstedt

Rick L. Koehmstedt, WSB 6-3101 Of Attorneys for Defendant New Mount Carmel Foundation, Inc. 141 S. Center St., Suite 500 Casper, WY 82601 (307) 235-6681 rick@schwartzbon.com

PATTERSON BUCHANAN FOBES & LEITCH, INC., P.S.

By: s/Patricia K. Buchanan

Patricia K. Buchanan, WSBA 19892

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Of Attorneys for Defendant New Mount
Carmel Foundation, Inc.
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on all parties per the CM/ECF electronic service of the Court, this 26^{th} day of March, 2021.

/s/Jennifer Friesen
Jennifer Friesen, Legal Assistant